

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

JOANN INC., et al.,¹

Debtors.

Chapter 11

Case No. 25-10068 (CTG)
(Jointly Administered)

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that the undersigned, as counsel to Park Associates LP, hereby enter their appearance in the above-captioned Chapter 11 cases pursuant to Rule 2002 of the Federal Rules of Bankruptcy Procedure, and hereby requests, pursuant to section 1109(b) of title 11 of the United States Code (as amended, the “Bankruptcy Code”) and Rules 2002, 3017(a), 9007 and 9010(b) of the Federal Rules of Bankruptcy Procedure (as amended, the “Bankruptcy Rules”), that any and all notices and papers filed or entered in this case or any related adversary proceedings be delivered to and served upon:

CAMPBELL & LEVINE, LLC
Katherine L. Hemming, Esquire (No. 5496)
222 Delaware Avenue, Suite 1620
Wilmington, DE 19801
Telephone: (302) 426-1900
Facsimile: (302) 426-9947
khemming@camlev.com

METZ LEWIS BRODMAN MUST O’KEEFE
Justin M. Tuskan, Esquire
PA ID No. 311235
444 Liberty Avenue, Suite 2100
Pittsburgh, PA 15222
Phone: (412) 918-1158
JTuskan@metzlewis.com

PLEASE TAKE FURTHER NOTICE that the foregoing request includes not only the notices and papers referred to in the Bankruptcy Code and the Bankruptcy Rules, but also includes, without limitation, orders and notices of any application, motion, petition, pleading, request, complaint or demand, whether formal or informal, whether written or oral, whether transmitted or

¹ The Debtors in these chapter 11 cases, together with the last four digits of each Debtor’s federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors’ mailing address is 5555 Darrow Road, Hudson, OH 44236.

conveyed by mail, courier service, hand-delivery, telephone, facsimile transmission, electronic mail, or otherwise is filed or made with regard to this case.

PLEASE TAKE FURTHER NOTICE, that neither this Notice of Appearance and Request for Service of Papers (the “Notice”) nor any later appearance, pleading, proof of claim, claim or suit shall constitute a waiver of any substantive or procedural right, including: (i) the right to have final orders in non-core matters entered only after de novo review by a District Court, (ii) the right to trial by jury in any proceeding triable in this case or any case, controversy, or proceeding related to this case, (iii) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) abstention, (v) any objection to the jurisdiction of this Court for any purpose other than with respect to this Notice, and (vi) any other rights, claims, actions, defenses, setoffs, or recoupments as appropriate, in law or in equity, under any agreements, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Date: February 13, 2025
Wilmington, Delaware

CAMPBELL & LEVINE, LLC

/s/ Katherine L. Hemming

Katherine L. Hemming (Bar No. 5496)
222 Delaware Avenue, Suite 1620
Wilmington, DE 19801
Phone: (302) 426-1900
khemming@camlev.com

and

METZ LEWIS BRODMAN MUST O’KEEFE

Justin M. Tuskan, Esquire
(*Pending Pro Hac Vice Admission*)
PA ID No. 311235
444 Liberty Avenue, Suite 2100
Pittsburgh, PA 15222
Phone: (412) 918-1158
JTuskan@metzlewis.com

Counsel to Park Associates LP